

Message

From: Matthew Todd [ToddM@api.org]
Sent: 7/3/2018 12:35:47 PM
To: Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]
Subject: API Comments on EPA's New Owner Audit Program for Oil and Gas Production
Attachments: 2018 07 02 API Comments on EPA New Owner Audit Program Final.pdf

Peter and David:

Yesterday, API filed the attached comments on EPA's New Owner Audit Program for oil and gas production sector. We copied Bill Wehrum on the submittal but I wanted to also bring this to your attention as well since the draft agreement currently requires companies to conduct engineering analyses of their vapor control systems.

Let me know if you have any questions.

Thanks,

Matt

From: Matthew Todd
Sent: Monday, July 2, 2018 12:23 PM
To: Apple Chapman (Chapman.Apple@epa.gov) <Chapman.Apple@epa.gov>
Cc: Susan Bodine (Bodine.susan@Epa.gov) <Bodine.susan@Epa.gov>; 'Bill Wehrum' <wehrum.bill@epa.gov>; Patrick Traylor (traylor.patrick@epa.gov) <traylor.patrick@epa.gov>; 'sullivan.tim@epa.gov' <sullivan.tim@epa.gov>; 'williams.christopher@epa.gov' <williams.christopher@epa.gov>
Subject: API Comments on EPA's New Owner Audit Program for Oil and Gas Production

Dear Ms. Chapman:

API respectfully submits the attached letter in response to the U.S. EPA's request for comments on its proposed changes to the 2000 policy titled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" for new owners of oil and natural gas exploration and production facilities and, in particular, the Agency's Draft Standard Audit Policy Agreement. API believes that the Audit Policy can be an important tool in furtherance of environmental compliance and hope this feedback will lead to a final program that provides a more flexible approach to eligibility and administration.

Please do not hesitate to contact me with any questions regarding the content of this submittal. We look forward to reviewing the revised draft agreement as discussed during the face-to-face meeting last Thursday, June 28th.

Regards,

Matt

Matthew Todd
API
202.682.8319